

# **EXHIBIT A**

SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER  
CLEVELAND, OHIO 44113CASE NO.  
CV16873048

D1 FX

SUMMONS NO.  
30952677

Rule 4 (B) Ohio

Rules of Civil  
ProcedureTAMARA N. NASRALLAH  
VS

PLAINTIFF

LAKEFRONT LINES, INC.

DEFENDANT

## SUMMONS

LAKEFRONT LINES, INC.  
13315 BROOKPARK ROAD  
BROOKPARK OH 44142

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on:



Plaintiff's Attorney

DAVID M BENSON  
1422 EUCLID AVENUE  
  
SUITE 970  
CLEVELAND, OH 44115-0000

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

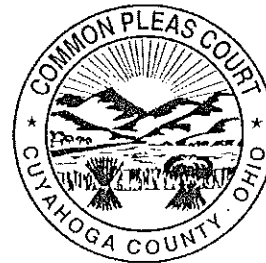
Case has been assigned to Judge:

DANIEL GAUL  
Do not contact judge. Judge's name is given for attorney's reference only.

NAILAH K. BYRD  
Clerk of the Court of Common Pleas

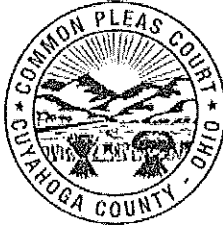
By \_\_\_\_\_ Deputy

DATE  
Dec 13, 2016



COMPLAINT FILED 12/12/2016





**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed:**  
**December 12, 2016 13:36**

By: DAVID M. BENSON 0062540

Confirmation Nbr. 933768

TAMARA N. NASRALLAH

CV 16 873048

vs.

**Judge:** DANIEL GAUL

LAKEFRONT LINES, INC.

**Pages Filed:** 4

IN THE COURT OF COMMON PLEAS  
FOR CUYAHOGA COUNTY, OHIO

TAMARA N. NASRALLAH  
510 Columbia Road  
Bay Village, OH 44140

Case No. \_\_\_\_\_

JUDGE \_\_\_\_\_

Plaintiff,

COMPLAINT (JURY DEMAND  
ENDORSED HEREON)

vs.

LAKEFRONT LINES, INC.  
13315 Brookpark Road  
Brookpark, OH 44142

Defendant.

NOW COMES Plaintiff Tamara N. Nasrallah, by and through her attorneys, and for her Complaint hereby avers, alleges and prays:

PARTIES

1. Tamara Nasrallah is a citizen and resident of Bay Village, Ohio. Nasrallah was employed by Defendant Lakefront Lines, Inc. in Cuyahoga County, Ohio.

2. Defendant Lakefront Lines, Inc. is a corporation organized under the laws of California, with its principal place of business in Paramus, New Jersey and its principal place of business in Ohio in Brookpark, Cuyahoga County, Ohio.

THE DISPUTE

3. This is an action for: (1) Violation of the Fair Labor Standards Act and (2) violation of Ohio's Minimum Wage Fair Standards Act.

4. Plaintiff seeks damages, liquidated damages and attorney's fees from Defendant for its wrongful and unlawful acts.

FACTUAL ALLEGATIONS

5. From January 2013 to July 2015, Nasrallah was employed by Lakefront Lines as

an Accounts Payable Clerk.

6. Nasrallah was paid on an hourly basis – approximately \$13 per hour – not a fixed salary. Nasrallah's job duties did not qualify as exempt professional, administrative or professional duties under the FLSA and/or OMWFSa. Nasrallah was not paid overtime at the legally-required rate of 1½ times her regular rate for all hours worked. Indeed, Nasrallah was told things such as "you don't deserve overtime". Nevertheless, Lakefront Lines forced Nasrallah to continue working and did not allow her to leave. In fact, Lakefront Lines cheated Nasrallah out of a great deal of overtime by fraudulently altering her timecards to fraudulently and deliberately mistate/understate Nasrallah's actual hours worked. Nasrallah worked approximately 50 hours per week, but as a result of Lakefront Lines' fraudulent alteration of her timecards, Nasrallah often received incomplete pay (or even no pay) for her 10 hours of overtime per week.

**COUNT ONE**  
**FAIR LABOR STANDARDS ACT**

7. Plaintiff incorporates by reference the allegations in Paragraphs 1 through 6 of her Complaint as if fully rewritten herein.

8. Defendant is an employer under the FLSA and was Nasrallah's FLSA employer during all times relevant hereto.

9. Defendant is an enterprise engaged in commerce within the meaning of the FLSA, in that said enterprise had employees engaged in commerce, or employees handling, selling or otherwise working on goods or materials that have been moved in or produced for commerce by any person.

10. Defendant failed to pay Nasrallah overtime wages for all of the overtime hours she worked (at 1½ times her regular rate). Instead, Defendant fraudulently altered Nasrallah's

timecards, often making Nasrallah work 50 hours per week but only paying her for 40 hours, at straight time pay.

11. Defendant violated Nasrallah's rights under the FLSA by failing to pay her required overtime wages for all overtime hours she worked.

12. Defendant is liable to Nasrallah for the overtime wages owed to her, plus an equal amount of liquidated damages, and reasonable attorneys' fees.

**COUNT TWO**  
**OHIO MINIMUM WAGE FAIR STANDARDS ACT**

13. Plaintiff incorporates by reference the allegations in Paragraphs 1 through 12 of her Complaint as if fully rewritten herein.

14. Defendant is an employer under the OMWFSa and was Nasrallah's OMWFSa employer during all times relevant hereto.

15. Defendant constituted an enterprise engaged in commerce within the meaning of the OMWFSa, in that said enterprise had employees engaged in commerce, or employees handling or otherwise working on goods or materials that have been moved in or produced for commerce by any person.

16. Defendant failed to pay Nasrallah overtime wages for all of the overtime hours she worked (at 1½ times her regular rate). Instead, Defendant fraudulently altered Nasrallah's timecards, often making Nasrallah work 50 hours per week but only paying her for 40 hours, at straight time pay.

17. Defendant violated Nasrallah's rights under the OMWFSa by failing to pay her the required overtime wage for all overtime hours she worked.

18. Defendant is liable to Nasrallah for the overtime wages owed to her, plus reasonable attorneys' fees.

WHEREFORE, Plaintiff prays:

1. That the Court award damages to Plaintiff and against Defendant, in an amount to be fully determined at trial but more than \$25,000.
2. That the Court award liquidated damages to Plaintiff and against Defendant, in an amount to be fully determined at trial but more than \$25,000.
3. That the Court award Plaintiff her reasonable attorneys' fees.
4. That the Court award Plaintiff such other and further relief as it deems just and proper.

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

By: /s/ David M. Benson

David M. Benson (0062540)  
The Hanna Building  
1422 Euclid Avenue, Suite 970  
Cleveland, OH 44115  
Telephone: 216.241.2510  
Facsimile: 815.301.8833  
david@davidbensonlaw.com

*Attorney for Plaintiff*